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**GOODWILL
INDUSTRIES of
SW OKLAHOMA**

Fax

To:	G. John Heyer	From:	John Conklan
Fax:	703-603-0655	Pages:	3 total
Phone:		Date:	1/24/05
Re:		CC:	
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GOODWILL INDUSTRIES
OF SOUTHWEST OKLAHOMA, INC.

1210 Summit Avenue
Lawton, Oklahoma 73501

Telephone 580/355-2163
Fax 580/355-2166

Our business works. So people can.

January 24, 2005

**President's Committee for Purchase from People
Who Are Blind or Severely Disabled
1421 Jefferson Davis Highway,
Jefferson Plaza 2, Suite 10800
Arlington, VA, 22202-3259
Attention G. John Hoyer**

Dear Mr. Heyer:

On behalf Goodwill Industries of Southwest Oklahoma, Inc., we are writing to express our opposition to the proposed notice of rulemaking [Docket No. 2004-01-01] from the President's Committee for Purchase From People Who Are Blind or Severely Disabled. The proposed rulemaking on governance standards for central nonprofit agencies and nonprofit agencies participating in the Javits-Wagner-O'Day (JWOD) Program exceeds the scope of the Committee's authority and Congressional mandate. Our Goodwill Industries has been serving the community of Southwest Oklahoma since 1958. Our mission is to empower people with disabilities and other barriers to achieve maximum independence through innovative programs, day services and employment opportunities. In 2004 Goodwill Industries of Southwest Oklahoma, served 150 people with disabilities.

The authorizing statute for the JWOD program clearly delineates the powers and responsibilities of the Committee (41 CFR 51-2.2, 41 U.S.C. § 46). These powers and responsibilities do not extend to governance standards or executive compensation. Both Congress and the Internal Revenue Service (IRS) have jurisdiction over these areas. The Committee is mandated with determining which commodities and services should be on the Committee's procurement list and fair market prices, and informing federal agencies about the JWOD program.

As a participating JWOD agency, we would hope that the Committee would comply fully with the Congressional intent to provide employment and training opportunities for persons who are blind or have other severe disabilities and not delve into areas for which it lacks both the Congressional and statutory authority necessary to promulgate governance and other standards. The proposed rules will impact the entire community of participating nonprofit agencies, despite the Committee's own comment that the overwhelming majority of JWOD-affiliated central nonprofits agencies and nonprofit agencies operate in an ethical and accountable manner.



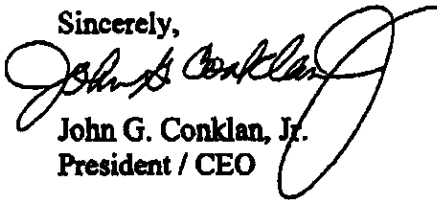
The United Way
OF LANTANA-FOOT HILL

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The statutory authority and regulations, as well as the legislative history, in addition to the applicable federal case law, do not support the Committee's actions. Furthermore, we have concerns understanding the rationale for the Committee to purport to assume regulatory authority over the governance standards for nonprofit, tax-exempt 501 (c) (3) organizations, because numerous federal entities exist to regulate these organizations.

We believe that the proposed rules do not advance the Congressional intent of the enacting JWOD legislation, and would, if adopted, diminish the program's ability to increase employment opportunities for the blind and disabled. We respectfully request that the Committee withdraw these rules.

Sincerely,



John G. Conklan, Jr.
President / CEO